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BEFORE THE  
**Federal Communications Commission**  
WASHINGTON, D. C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
)  
Amendment of Section 73.202(b), )  
Table of Allotments, )  
FM Broadcast Stations )  
(Hart, Pentwater and Coopersville, Michigan )

MM Docket No. \_\_\_\_\_  
RM- \_\_\_\_\_

To: Chief, Allocations Branch, Mass Media Bureau

**PETITION FOR RULEMAKING**

Waters Broadcasting Corporation ("Waters"), licensee of Station WCXT, Channel 287C2,  
Hart, Michigan and Synergy Media, Inc. ("Synergy"), licensee of Station WWKR, Channel 231A,  
Pentwater, Michigan, herein petition the Commission to:

(a) with respect to WCXT, (i) move the allotment used by the station from Hart,  
Michigan to Coopersville, Michigan, (ii) convert that allotment from Channel 287C2 to  
Channel 287B and (iii) modify the WCXT license accordingly, and

(b) with respect to WWKR, (i) move WWKR's allotment from Pentwater, Michigan  
to Hart, Michigan and (ii) modify WWKR's license accordingly.

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While the relocation of WCXT from Hart to Coopersville would require a modification of the station's physical facilities, the change in WWKR's community of license from Pentwater to Hart would not entail any change in the station's physical facilities. In support of this petition, the following is stated:

Waters' proposal would result in greater service to the public by providing Coopersville, an incorporated community with a population of 3,910 persons,<sup>1</sup> a first local service and by permitting a significant improvement of the facilities of WCXT. While Hart (population 1,950) would lose WCXT as a local transmission service, that service would be replaced by WWKR.<sup>2</sup>

Operating from the reference coordinates proposed (NL 43-20-36, WL 85-52-16), WCXT will provide primary service to a population of 1,116,129 persons in an area 12,491.3 square kilometers. The gain area covers 7,995.70 square kilometers with a population 930,977 persons. Thus, implementation of the proposal will mean more than a 400% increase in population within the station's primary service contour (from 215,696 presently to 1,116,129). With the transition of WCXT from Class C2 to Class B status, the total area within the station's primary contour will increase 110% (from 5,955.4 square kilometers presently to 12,491 square kilometers). The area that

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<sup>1</sup> All population figures are from the year 2000 Census.

<sup>2</sup> WWKR's present community of license, Pentwater, Michigan, will continue to be served by WMOM(FM). Furthermore, Channel 280A has been allotted to Pentwater. *See Report and Order in MM Docket No. 00-141*, DA 01-61 (released January 12, 2001).

will lose primary service from WCXT (1,456.8 square kilometers with a population of 30,544 persons) is served by five or more other aural services.<sup>3</sup>

In order for an existing FM station to change its community of license without affording other interested parties an opportunity to file competing expressions of interest, the proposed channel must be mutually exclusive with the existing channel. *Modification of FM and TV Authorizations to Specify a New Community of License*, 4 FCC Rcd 4870 (1989) *recon. granted in part*, 5 FCC Rcd 7094 (1990), (hereinafter "*Community of License*"). Moreover, the proposed allotment arrangement must be preferred, under the Commission's Allotment Priorities, over the existing arrangement. *Id.* The attached Engineering Study prepared by Munn-Reese, Inc. clearly demonstrates that allotment of Channel 287B to Coopersville is mutually exclusive with the WCXT allotment at Hart. *See* Exhibit A, Exhibit 1.0. Moreover, the arrangement the petitioners propose would better serve the public in that (a) Coopersville will receive its first local service while Hart, the smaller of the two communities, will still have a local transmission service with the change in WWKR's community of license, and (b) WCXT will be able to serve a much larger population.

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<sup>3</sup> See Engineering Statement of Munn-Reese, Inc. (Exhibit A hereto), Figures 2.0 - 2.3. As detailed in the Munn-Reese Engineering Statement, if service provided by Noncommercial Educational Station WBLV were not considered, there would be two very small areas (combined, 28.0 square kilometers with a population of 219 persons) that would receive only four commercial aural services. *Id.*, Figures 2.4 - 3.1b. But there is no question that the service provided by WBLV is to be considered. *Modification of FM and TV Authorizations to Specify a New Community of License*, 5 FCC Rcd 7094, 7097 & n.19 (1990); *Channel 32 Broadcasting Co.*, 6 FCC Rcd 5188, 5188-89 (1991), *aff'd by judgment sub nom. Kansas City TV Limited Partnership v. FCC*, No. 91-1491 (D.C. Cir. May 10, 1993); *Johannesburg and Edwards, California*, 4 FCC Rcd 9557, ¶ 5 (Chief, Allocations Branch 1999).

Coopersville is located in Ottawa County and is situated outside of any Census Bureau-designated Urbanized Area. The 70 dbu contour of the proposed station will cover only 42.8 percent of the Muskegon Urbanized Area. See Exhibit A, p. 1. Thus, since less than half of the Urbanized Area would be within the city-grade contour of the proposed station, the proponents are not required to make a showing with respect to the criteria listed in *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988). E.g., *Headland, Alabama* and *Chattahooche, Florida* 10 FCC Rcd 10,352 (1995). Nonetheless, even if a *Tuck* analysis is conducted, the clear conclusion must be that Coopersville is an independent community well deserving of its first local broadcast service.

Under *Tuck*, the Commission considers (a) the degree to which the station would provide coverage not only to the designated community of license but to the nearby metropolis; (b) the size and proximity of the designated community vis-à-vis the central city and (c) the degree to which the proposed community is independent from the central city.

With respect to the first criterion, as noted above, WCXT's 70 dbu contour would encompass less than 43 percent of the Muskegon Urbanized Area. The Commission, of course, on numerous occasions has approved reallocation proposals involving substantially greater levels of city-grade coverage of a nearby Urbanized Area. E.g., *Oraibi, Arizona*, 14 FCC Rcd 13547 (Chief, Allocations Branch 1999) (90 percent); *Mullins, South Carolina*, 14 FCC Rcd 10516 (Chief, Allocations Branch 1999) (67 percent).

With respect to the second criterion, Coopersville's population (3,910) is 9.75 percent of the population of the central city, Muskegon (40,105). This percentage is larger than approved in other

cases. *E.g., Anniston, Alabama*, 16 FCC Rcd 3411 (Chief, Allocations Branch 2001) (5.1 percent), *recon. denied*, FCC 01-324 (released November 8, 2001); *Ada, Oklahoma*, 11 FCC Rcd 16869 (Chief, Allocations Branch 1996) (0.9 percent); *Scotland Neck, North Carolina*, 10 FCC Rcd 11066 (Chief, Allocations Branch 1995) (3.1 percent). Furthermore, the reference point for Coopersville is 19.7 miles from the reference point for Muskegon. *See Exhibit B.*

With respect to the third criterion, the information presented here clearly demonstrates Coopersville's status as an independent community. Indeed, Coopersville satisfies nearly all of the eight factors *Tuck* lists.<sup>4</sup>

1. **Many Employment Opportunities are Available in Coopersville for its Residents.**

Coopersville is a strong economic community. Various Coopersville businesses provide employment to thousands of area residents. Some of the largest employers are Adelphi Automotive System (which manufactures fuel injectors), 797 employees; ETV Trucking, 300 employees;

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<sup>4</sup> To wit: (1) the extent to which the community residents work in the larger metropolitan area, rather than the specified community; (2) whether the smaller community has its own newspaper or other media that covers the community's needs and interests; (3) whether community leaders and residents perceive the specified community as being an integral part of, or separate from, the larger metropolitan area; (4) whether the specified community has its own local government and elected officials; (5) whether the smaller community has its own local telephone book provided by the local telephone company or zip code; (6) whether the community has its own commercial establishments, health facilities, and transportation systems; (7) the extent to which the specified community and the central city are part of the same advertising market; and (8) the extent to which the specified community relies on the larger metropolitan area for various municipal services such as police, fire protection, schools, and libraries. The Commission has deemed a community to be independent when a majority of these factors demonstrate that the community is distinct from the urbanized area. *Parker and St. Joe, Florida*, 11 FCC Rcd 1095 (1996); *Jupiter and Hobe Sound, Florida*, 12 FCC Rcd 3570 (1997).

Coopersville Area Public Schools, 250 employees; Four Way Transportation, Inc., 300 employees; and Saturn Electronics and Engineering, 158 employees. *See* Exhibit C. Numerous other businesses are located in Coopersville. *Id.*

**2. Coopersville is Served by Local Area Newspapers.**

*The Coopersville Observer* is a bi-weekly community newspaper. Each edition averages about 20 pages. It has a circulation of 8,400. Additionally, *The Ottawa Advance* is published monthly in nearby Jenison, Michigan and serves six communities in Ottawa County, including Coopersville. It has a circulation of 150,000. *See* Exhibits D and E.

**3. Coopersville Residents Consider their Community to be Separate from Muskegon or Grand Rapids.**

Coopersville residents demonstrate their affiliation with their community through numerous activities and organizations. Besides the Coopersville Area Chamber of Commerce, Coopersville boasts a Rotary Club, Sportsman Club, Lions Club, the Youth Soccer Organization, a chapter of Big Brother and Big Sisters, the Greater Coopersville Area JCs, Coopersville Area Historical Society and Museum and Coopersville Cares, which is a crisis assistance service. The Coopersville Historical Museum features a memorial to Dell Shannon, an early rock and roll star who was a Coopersville native. Also located in the community are the old-time Coopersville and Marne Railway and the Coopersville Farm Museum. *See* Exhibit F.

**4. Coopersville has its own Local Government and Elected Officials.**

Coopersville, which was established in 1871 and chartered as a city in 1967, is governed by a mayor and city council. Day-to-day administrative matters are handled by a professional city manager appointed by the mayor and council. Among the city boards and commissions are the Downtown Development Authority, the Planning Commission, the Recreation Board and the Zoning Board of Appeal. *See* Exhibit G. The city government also operates several city parks, including a sports complex. *Id.* The city government has 15 full-time employees. *See* Exhibit E.

**5. Coopersville has its own Zip Code.**

Coopersville has its own post office at 314 Main Street and its own zip code -- 49404. *See* Exhibit H.

**6. Coopersville has Its own Commercial Establishments and Health Facilities.**

As the partial listing in Exhibit I demonstrates, Coopersville has numerous commercial establishments. The Coopersville Chamber of Commerce has over 200 members. The community also has health care services. *See* Exhibit J. Furthermore, many churches are located in Coopersville. *See* Exhibit K. Regarding transportation services, Stagecoach Limousines, Ltd., located in Coopersville, provides six and twelve passenger vehicles for all occasions. *See* Exhibit I.

**7. Businesses can Advertise to Coopersville Residents Through Local Media.**

As noted above, Coopersville is served by *two* community newspapers, which provides a way for advertisers to reach Coopersville residents. Additionally, businesses can advertise on the “coopersville.com” website. *See Exhibit L.*

**8. Coopersville is Not Dependent on Muskegon for Municipal Services.**

The City of Coopersville provides water and sewer service to the community. *See Exhibit M.* Emergency and rescue services are provided by Coopersville Rescue. The City also has its own Emergency Services Director. The Coopersville-Polkton Fire Department provides fire protection. (Polkton is a township adjacent to Coopersville.) Police services are provided by the Coopersville Branch Office of the Ottawa County Sheriff’s Office, which is located in the Coopersville City Hall. *See Exhibit N.*

Operated by Coopersville Area Public Schools are elementary, junior high and high schools. Enrollment exceeds 2,600 students. The instructors number more than 120. Also located in Coopersville is St. Michael’s Catholic School and Lamont Christian School. *See Exhibit O.*



### **CONCLUSION**

To summarize, the public interest clearly would be served by adoption of the rulemaking proposal presented. Coopersville, a vibrant community, would receive its first local broadcast service and Hart will retain a local broadcast service. Moreover, WCXT will be able to provide primary service to an additional 900,000 persons, bringing the total population within its protected contour to 1,116,129, more than a four-fold increase over the population within the station's current protected contour.

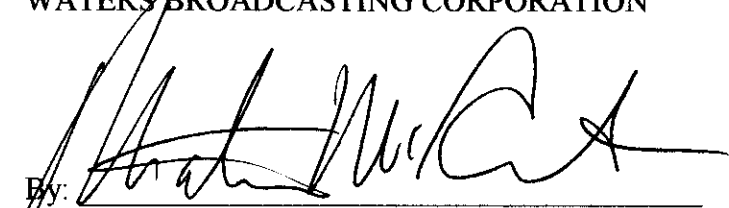
WHEREFORE, in light of all circumstances present, it is respectfully requested that a Notice of Proposed Rule Making be issued proposing that the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, be amended as follows:

<b><u>Community</u></b>	<b><u>Present Channel No.</u></b>	<b><u>Proposed Channel No.</u></b>
Coopersville, MI	-----	287B
Hart, MI	287C2	231C3
Pentwater, MI	231C3, 274A, 280A	274A, 280A

FURTHERMORE, the license of WCXT should be modified to specify operation on Channel 287B at Coopersville, Michigan and the license of Station WWKR should be modified to specify operation on Channel 231C3 at Hart, Michigan.

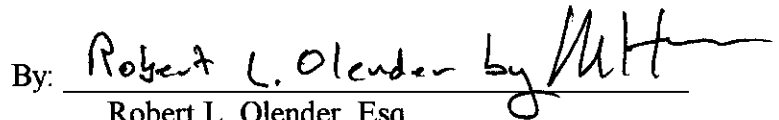
Reddy, Begley & McCormick, LLP  
2175 K Street, N.W., Suite 350  
Washington, D.C. 20037-1845  
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WATERS BROADCASTING CORPORATION

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Its Counsel

February 15, 2002

**EXHIBIT A**

**ENGINEERING REPORT**

**Petition for Rulemaking  
to Amend §73.202(b)  
on behalf of  
WCXT(FM) – Hart, MI  
January, 2002**

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**MUNN-REESE, INC.**  
Broadcast Engineering Consultants  
Coldwater, MI 49036

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## **ENGINEERING STATEMENT** (continued)

### **In Support of a Petition to Amend §73.202(b)**

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A reallocation of the city of license of Pentwater for WWKR, Channel 231C3 to the community of Hart, MI would not result in the loss of service to any community. Pentwater would still have licensed FM station WMOM, Channel 274A, 103.7MHz, as an aural service. In addition, Hart, MI would receive 70 dBu service from the present WWKR site with its present operating parameters. **Exhibit 4.0** is a map depicting this coverage. As neither the frequency or transmitter site are being changed, the present allocation will remain unchanged.

It is requested that 47 C.F.R. §73.202(b) be amended as follows:

<b><u>COMMUNITY</u></b>	<b><u>PRESENT</u></b>	<b><u>PROPOSED</u></b>
Coopersville, MI	---	287B
Hart, MI	287C2	231C3
Pentwater, MI	231C3, 274A, 280A	274A, 280A

# **CERTIFICATION OF ENGINEERS**

The firm of Munn-Reese, Inc., Broadcast Engineering Consultants, with offices at 100 Airport Drive, Coldwater, Michigan, has been retained for the purpose of preparing the technical data forming this report.

The data utilized in this report was taken from the FCC Secondary Database and data on file. While this information is believed accurate, errors or omissions in the database and file data are possible. This firm may not be held liable for damages as a result of such data errors or omissions.

The report has been prepared by properly trained electronics specialists under the direction of the undersigned whose qualifications are a matter of record before the Federal Communications Commission.

I declare under penalty of perjury that the contents of this report are true and accurate to the best of my knowledge and belief.

January 29, 2002

**MUNN-REESE, INC.**

By Wayne S. Reese  
Wayne S. Reese, President

By Justin W. Asher  
Justin W. Asher, Project Engineer

100 Airport Drive, PO Box 220  
Coldwater, Michigan 49036

Telephone: 517-278-7339

**MUNN-REESE, INC.**  
Broadcast Engineering Consultants  
Coldwater, MI 49036

# EXHIBIT 1.0

## Tabulation of Proposed Allocation

REFERENCE  
43 20 36 N CLASS = B  
85 52 16 W Current Spacings  
----- Channel 287 - 105.3 MHz -----

DISPLAY DATES  
DATA 01-19-02  
SEARCH 01-21-02

Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.	Power	HAAT			
WCXT	LIC 287C1	Hart	MI	47.46	321.4	270.0 -222.54
43 40 34	86 14 21	CN 100.000 kW		198 M		
Waters Broadcasting Corpor BLH19830928AG						
WCXT.C CP	287C2	Hart	MI	47.45	321.4	241.0 -193.55
43 40 34	86 14 20	CX 28.000 kW		201 M		
Waters Broadcasting Corpor BPH20010123ABF						
WKHMFM LIC	287A	Brooklyn	MI	178.68	137.3	178.0 0.68
42 09 14	84 24 07	CN 2.200 kW		115 M		
Jackson Radio Works, Inc. BLH19940201KC						
WOODFM LIC	289B	Grand Rapids	MI	78.65	157.9	74.0 4.65
42 41 13	85 30 35	CN 265.000 kW		247 M		
Clear Channel Broadcasting BMLH19931005KD						
Grandfathered with 265 kW ERP at 247 meters HAAT						
WFZH CP	287A	Mukwonago	WI	193.08	258.3	178.0 15.08
42 58 05	88 11 20	CX 1.650 kW		193 M		
Caron Broadcasting, Inc. BMPH20010123ABX						
WQBX LIC	285A	Alma	MI	102.66	88.0	69.0 33.66
43 22 08	84 36 19	EN 6.000 kW		92 M		
Jacom, Inc. BMLH19960617KB						
Increase of ERP to 6.0 KW per MM Doc. No. 88-375						
WKLQ LIC	233B	Holland	MI	54.70	187.8	20.0 34.70
42 51 20	85 57 45	CN 50.000 kW		152 M		
Citadel Broadcasting Compa BLH19840309AR						
WWCKFM LIC	288B1	Flint	MI	184.25	100.8	145.0 39.25
43 00 39	83 39 04	ZCN 25.000 kW		100 M		
Cumulus Licensing Corp. BLH19970124KD						
Proposed as Class B1 to Canada 900528-Specially-negotiated, short-spaced a						
llotment limited to 4.0 kw ERP and 100m HAAT or the equivalent toward chan						
nel 288A in Chatham, ON-Accepted by Canada 900907						
981110 CP	285A	Lake City	MI	110.17	23.8	69.0 41.17
44 14 56	85 18 48	ZCN 1.600 kW		149 M		
Superior Communications BPED19981110MP						
Commercial Channel Operating Educational						
WOJO.C CP	286B	Evanston	IL	215.42	222.3	169.0 46.42
41 53 56	87 37 23	CX 5.700 kW		425 M		
Tichenor License Corporati BPH20000613ABB						
WOJO LIC	286B	Evanston	IL	215.42	222.3	169.0 46.42
41 53 56	87 37 23	CN 8.400 kW		358 M		
Tichenor License Corporati BLH19910104KA						
981110 APP	285A	Lake City	MI	116.07	23.6	69.0 47.07
44 17 55	85 17 14	C 6.000 kW		100 M		
Nassawadox Fm Inc. BPED19981110MQ						
WBMI LIC	288A	West Branch	MI	167.17	49.9	113.0 54.17
44 17 57	84 15 59	CN 6.000 kW		91 M		
Northern Radio Network Cor BMLH19940328KD						
Class B1 with respect to Canada						

MUNN-REESE, INC.  
Broadcast Engineering Consultants  
Coldwater, MI 49036

Reference Point

Latitude: 43-20-36 N  
Longitude: 085-52-16 W  
Power: 50.00 kW  
Channel: 287  
Frequency: 105.3 MHz  
AMSL Height: 383.237 m  
Elevation: 237.65 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: None

Walkerville

Figure 1.1

WCXT - Coopersville  
Channel 287B Service Contours

White Cloud

Stanwood

F150-50 70.0 dBu

Fremont

Morley

Reference Point

Howard City

Whitehall

Twin Lake

Newaygo

Lakeview

Wolf Lake

Grant

Pierston

Sand Lake

Muskegon Heights

Muskegon

Kent City

Cedar Springs

Rockford

Greenville

Belding

Sherrill

Montcalm

Stanton

Mc

Lot

Scale 1:500,000

0 6 12 18 km

V-Soft Communications LLC

East Grand Rapids

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Walker

Comstock Park

Kent

Rockford

Sparta



85° 52' 30"  
43° 22' 30"

192000E

993

994

50'

995

# Exhibit 1.2

Topographical Map Showing Reference Point

Special Reference Point

**MUNN-REESE, INC.**  
Broadcast Engineering Consultants  
COLDWATER, MI 49036-0220  
517-278-7339

**GRANT, MICHIGAN**  
PROVISIONAL EDITION 1985

43085-C7-TM-024

SCALE 1:24 000



CONTOUR INTERVAL 3 METERS  
SUPPLEMENTARY CONTOUR INTERVAL 1.5 METERS



**Figure 2.0**  
Proposed Gain / Loss Area  
WCXT (60 dBu) vs WCXT.RM (54 dBu)

Loss Area - (30,544) pop / 1,459.8 km sq.  
Gain Area - 930,977 pop / 7,965.70 km sq.  
Common Overlap - 185,152 pop / 4,495.6 km sq.

**WCXT**

Latitude: 43-40-34 N  
Longitude: 086-14-20 W  
Power: 28.00 kW  
Channel: 287  
Frequency: 105.3 MHz  
AMSL Height: 444.0 m  
Elevation: 285.77 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: FCC Curves

**WCXT.RM**

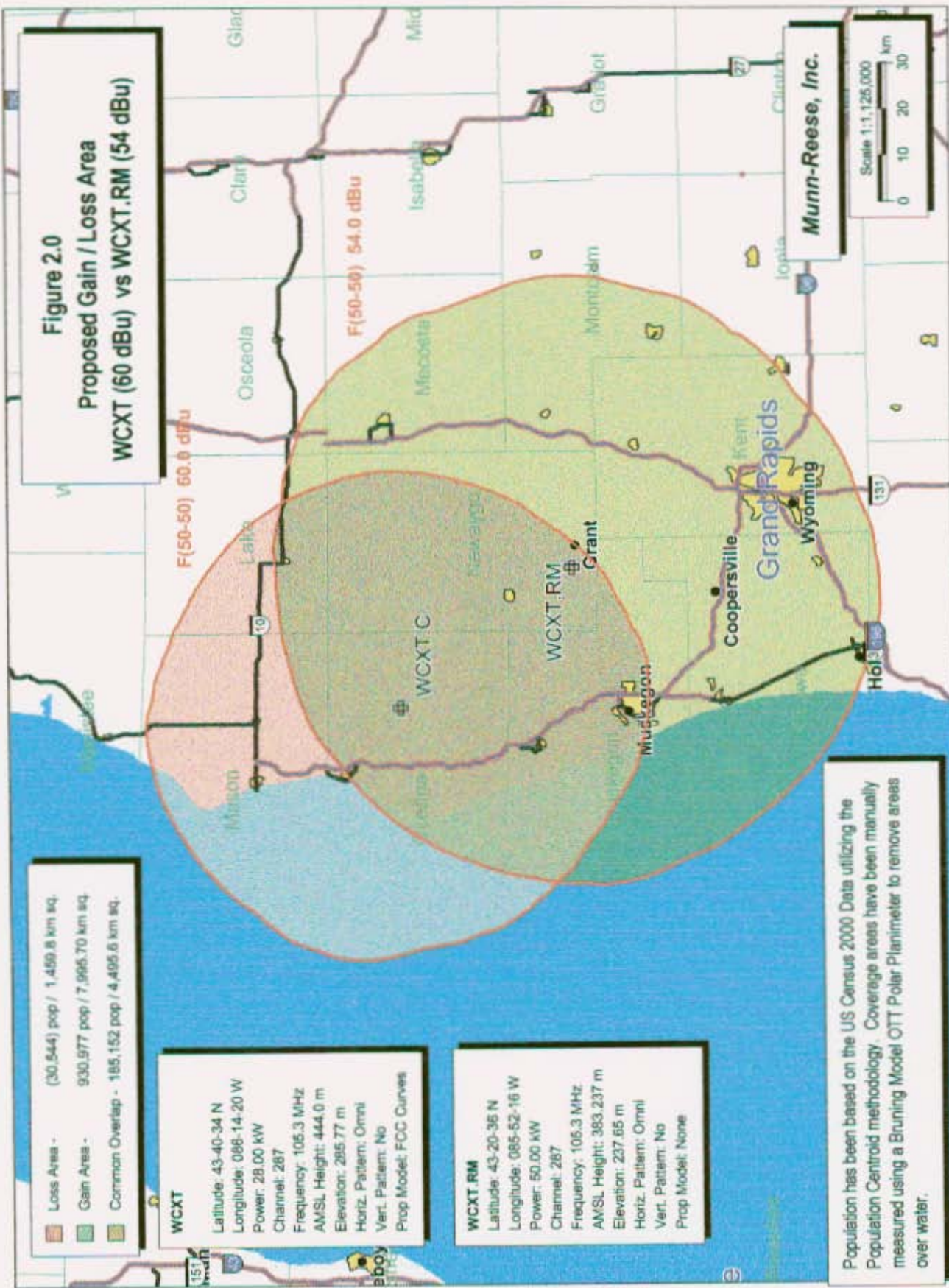
Latitude: 43-20-35 N  
Longitude: 085-52-16 W  
Power: 50.00 kW  
Channel: 287  
Frequency: 105.3 MHz  
AMSL Height: 383.237 m  
Elevation: 237.65 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: None

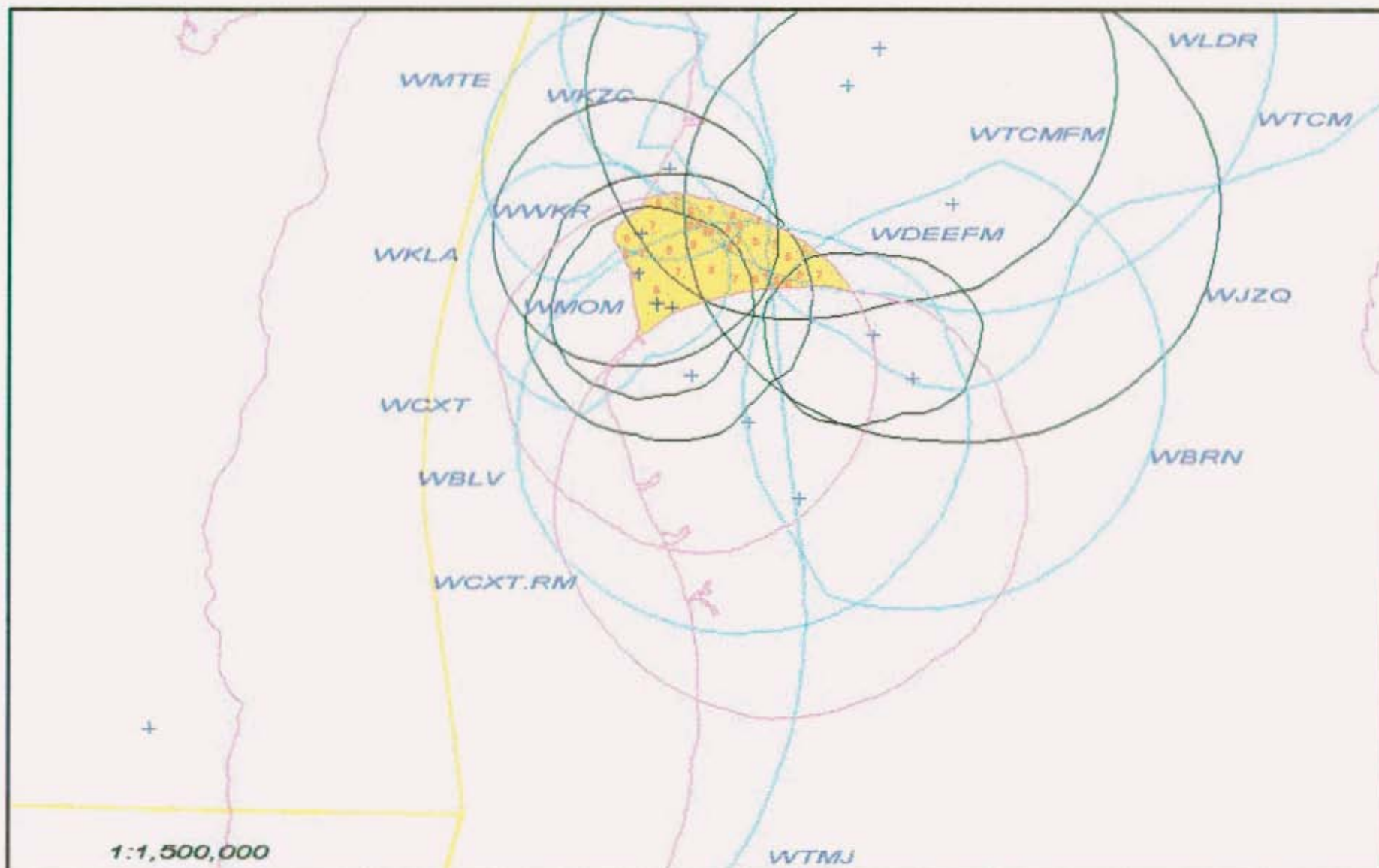
Population has been based on the US Census 2000 Data utilizing the Population Centroid methodology. Coverage areas have been manually measured using a Bruning Model OTT Polar Planimeter to remove areas over water.

**Munn-Reese, Inc.**

Scale 1:1,125,000

0 10 20 30 km





Scale in km  
0 10 20 30 40 50 60 70 80 90

**Proposed Loss Area**  
WCXT Class C2 (60 dBu) vs WCXT.RM Class B (54 dBu)

**Figure 2.1**  
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## FIGURE 2.2

### Tabulation of Aural Services to Loss Area

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#### AM Stations (6) Providing Service to Loss Area:

CALL	COORDINATES	FREQ	POWER(kW)	CITY	STATE
WBRN	433957 852859	1460	5	BIG RAPIDS	MI
WKLA	435705 862528	1450	1	LUDINGTON	MI
WLDR	443334 853537	1210	50	KINGSLEY	MI
WMTE	441407 861905	1340	1	MANISTEE	MI
WTCM	444318 854218	580	15	TRAVERSE CITY	MI
WTMJ	424228 880357	620	50	MILWAUKEE	WI

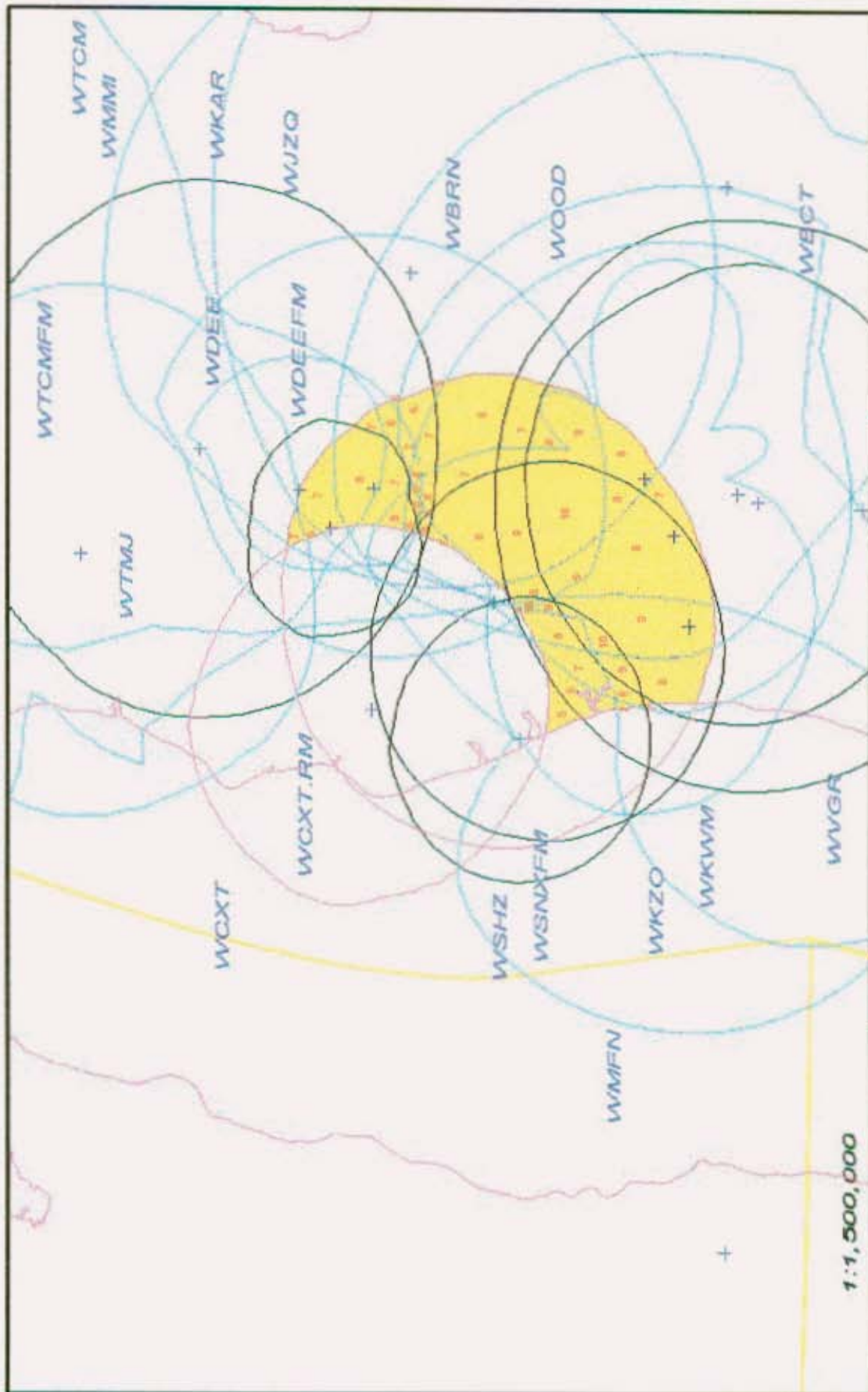
#### FM Stations (7) Providing Service to Loss Area:

CALL	COORDINATES	Channel	POWER(kW)	CITY	STATE
WJZQ	440812 852033	225C	100	Cadillac	MI
WKZC	440327 862458	35C3	17	Scottville	MI
WMOM	435210 862132	274A	6	Pentwater	MI
WTCMFM	442731 854202	278C	100	Traverse City	MI
WWKR	435133 861827	231C3	13	Pentwater	MI
WDEEFM	434653 853658	247A	2.8	Reed City	MI
WBLV*	433000 860234	212C1	100	Twin Lake	MI

Stations provided in **Figure 2.1** reflect only the minimum required number of facilities needed to provide all portions of the WCXT lost service area with five (5) aural services. A complete listing of all stations which provide more than the minimum five (5) aural services will be supplied to the commission upon request.

Contours provided are reflective of Licensed 60 dBu (1.0 mV/m) FM service areas and 0.5 mV/m AM service areas.

*\*WBLV operates as a Non-commercial facility. A gain/loss study with WBLV removed has been prepared in **Figure(s) 3.0 to 3.1(a-b)**.*



**Figure 2.3**  
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**Proposed Gain Area**  
WCXT Class C2 (60 dBu) vs WCXT, RM Class B (54 dBu)

Scale in km  
0 10 20 30 40 50 60 70 80 90



## FIGURE 2.4

### Tabulation of Aural Services to Gain Area

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#### AM Stations (9) Providing Service to Gain Area:

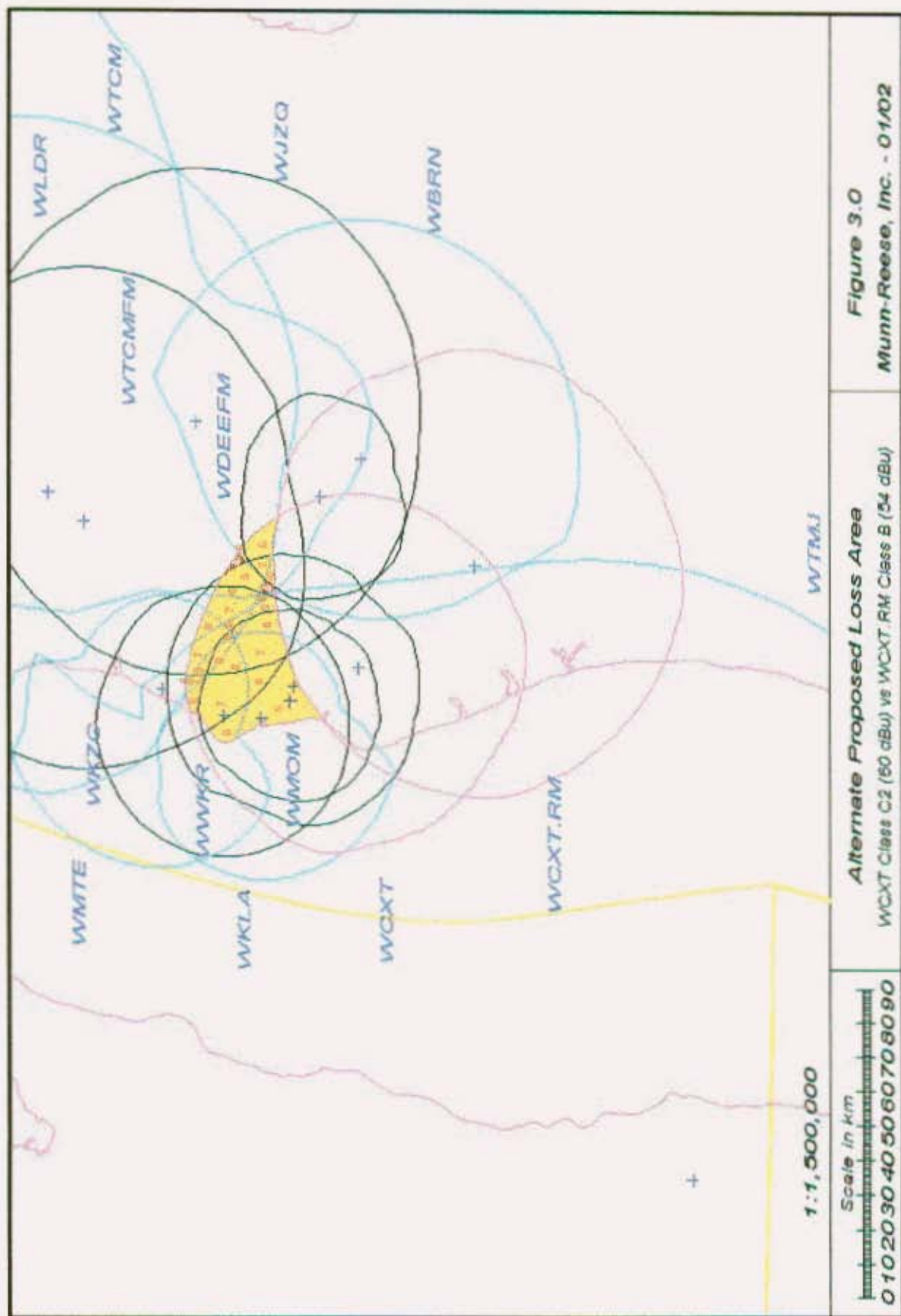
CALL	COORDINATES	FREQ	POWER(kW)	CITY	STATE
WBRN	433957 852859	1460	5	BIG RAPIDS	MI
WKAR	424219 842830	870	10	EAST LANSING	MI
WKWM	425613 852720	1140	5	KENTWOOD	MI
WMFN	424859 855724	640	1.2	ZEELAND	MI
WMMI	433342 844500	830	1	SHEPHERD	MI
WOOD	425124 853903	1300	5	GRAND RAPIDS	MI
WTCM	444318 854218	580	15	TRAVERSE CITY	MI
WTMJ	424228 880357	620	50	MILWAUKEE	WI
WDEE	435209 852904	1500	0.2	REED CITY	MI

#### FM Stations (8) Providing Service to Gain Area:

CALL	COORDINATES	Channel	POWER(kW)	CITY	STATE
WBCT	423756 853216	229B	320	Grand Rapids	MI
WKZC	440327 862458	235C3	17	Scottville	MI
WSHZ	431638 862005	300B1	15	Muskegon	MI
WSNXFM	431216 860145	283B	32	Muskegon	MI
WTCMFM	442731 854202	278C	100	Traverse City	MI
WDEEFM	434653 853658	247A	2.8	Reed City	MI
WJZQ	440812 852033	225C	100	Cadillac	MI
WVGR	424113 853035	281B	108	Grand Rapids	MI

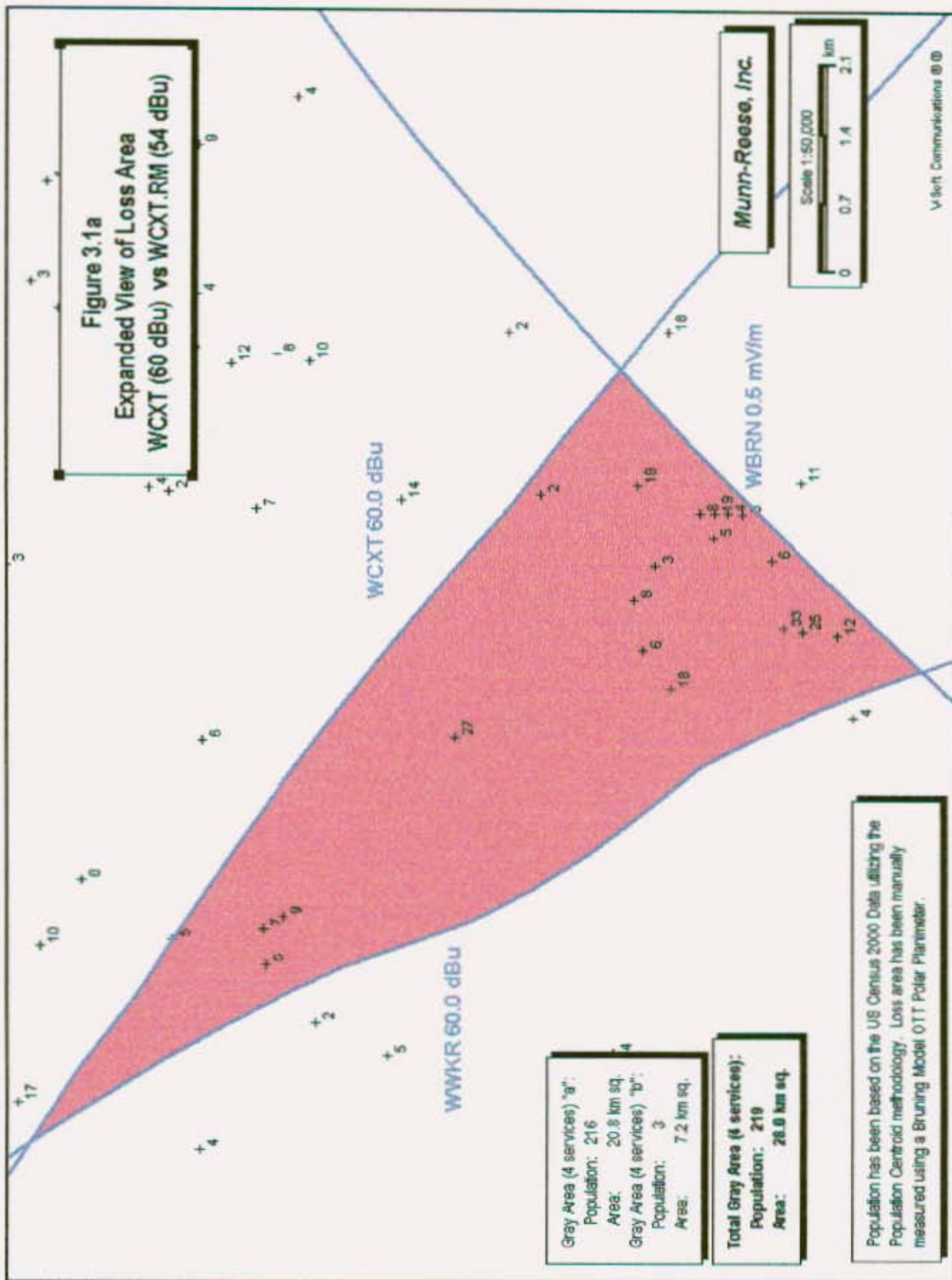
Stations provided in **Figure 2.3** reflect only the minimum required number of facilities needed to provide all portions of the WCXT gain service area with five (5) aural services. A complete listing of all stations which provide more than the minimum five (5) aural services will be supplied to the commission upon request.

Contours provided are reflective of Licensed 60 dBu (1.0 mV/m) FM service areas and 0.5 mV/m AM service areas.



**Figure 3.0**  
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**Alternate Proposed Loss Area**  
WCXT Class C2 (60 dBu) vs WCXT RM Class B (54 dBu)







**WWKR**

BLH19950609KC

Latitude: 43-51-33 N

Longitude: 086-18-27 W

Power: 13.00 kW

Channel: 231

Frequency: 94.1 MHz

AMSL Height: 353.0 m

Elevation: 220.08 m

Horiz. Pattern: Omni

Vert. Pattern: No

Prop Model: None

## Exhibit 4.0

### 70 dBu Coverage of Hart, MI

